

PUBLIC DISCLOSURE

May 20, 2010

**MORTGAGE LENDER COMMUNITY INVESTMENT
PERFORMANCE EVALUATION**

**GREENPARK MORTGAGE CORPORATION
MC1883 et al**

**140 GOULD STREET
NEEDHAM, MA 02494**

**DIVISION OF BANKS
1000 WASHINGTON STREET
BOSTON, MA 02118**

<p>NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this mortgage lender. The rating assigned to this mortgage lender does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this mortgage lender.</p>
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GENERAL INFORMATION

Massachusetts General Laws chapter 255E, section 8 and the Division of Banks' ("Division") regulation 209 CMR 54.00, Mortgage Lender Community Investment ("MLCI"), require the Division to use its authority when examining mortgage lenders subject to its supervision who have made 50 or more home mortgage loans in the last calendar year, to assess the mortgage lender's record of helping to meet the mortgage credit needs of the Commonwealth, including low- and moderate-income neighborhoods and individuals, consistent with the safe and sound operation of the mortgage lender. Upon conclusion of such examination, the Division must prepare a written evaluation of the mortgage lender's record of meeting the credit needs of the Commonwealth.

This document is an evaluation of the MLCI performance of **Greenpark Mortgage Corporation (or "Greenpark")** prepared by the Division, the mortgage lender's supervisory agency, as of **May 20, 2010**.

SCOPE OF EXAMINATION

An evaluation was conducted using examination procedures, as defined by MLCI. A review of the Division's records, as well as the mortgage lender's public MLCI file, did reveal one complaint. However, it was unrelated to Greenpark's mortgage lender performance during the evaluation period.

The MLCI examination included a comprehensive review and analysis, as applicable, of Greenpark's:

- (a) origination of loans and other efforts to assist low and moderate income residents, without distinction, to be able to acquire or to remain in affordable housing at rates and terms that are reasonable considering the lender's history with similarly situated borrowers, the availability of mortgage loan products suitable for such borrowers, and consistency with safe and sound business practices;
- (b) origination of loans that show an undue concentration and a systematic pattern of lending resulting in the loss of affordable housing units;
- (c) efforts working with delinquent residential mortgage customers to facilitate a resolution of the delinquency; and
- (d) other efforts, including public notice of the scheduling of examinations and the right of interested parties to submit written comments relative to any such examination to the Commissioner, as, in the judgment of the Commissioner, reasonably bear upon the extent to which a mortgage lender is complying with the requirements of fair lending laws and helping to meet the mortgage loan credit needs of communities in the Commonwealth.

MLCI examination procedures were used to evaluate Greenpark's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered Greenpark's lending and community development activities for the period of January 2008 through December 2009. The data and applicable timeframes for the Lending Test and the Service Test are discussed below.

The Lending Test evaluates the mortgage lender's community investment performance pursuant to the following five criteria: geographic distribution of loans, lending to borrowers of different incomes, innovative and flexible lending practices, fair lending, and loss of affordable housing.

Home mortgage lending for 2008 and 2009 is presented in the geographic distribution, lending to borrowers of different incomes and the Minority Application Flow tables. Comparative analysis of the mortgage lender's lending performance for the years of 2008 and 2009 is provided because they were the most recent years for which aggregate lending data is available pursuant to the Home Mortgage Disclosure Act ("HMDA"). The aggregate lending data is used for comparison purposes within the evaluation and is a measure of loan demand. It includes lending information from all HMDA reporting lenders that originated loans in the Commonwealth of Massachusetts.

In addition to gathering and evaluating statistical information relative to a mortgage lender's loan volume, the MLCI examination also reflects an in depth review of the entity's mortgage lending using qualitative analysis, which includes, but is not limited to: an assessment of the suitability and sustainability of the mortgage lender's loan products by reviewing the lender's internally maintained records of delinquencies and defaults as well as information publicly available through the Federal Reserve Banks and through local Registries of Deeds and through other sources available to the examination team. The examination included inspection of individual loan files for review of compliance with consumer protection provisions and scrutiny of these files for the occurrence of disparate treatment based on a prohibited basis.

The Service Test evaluates the mortgage lender's record of helping to meet the mortgage credit needs by analyzing the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products, the extent and innovativeness of its community development services, and, if applicable, loss mitigation services to modify loans and/or efforts to keep delinquent home borrowers in their homes.

MORTGAGE LENDER'S MLCI RATING:

This mortgage lender is rated " Satisfactory."

- The geographic distribution of the lender's loans reflects an adequate dispersion in low- and moderate-income census tracts as it is reflective of the distribution of owner occupied housing in those census tracts.
- The distribution of borrower reflects, given the demographics of Massachusetts, an adequate record of serving the credit need among individuals of different income levels, including low- and moderate-income.
- Greenpark offers a number of flexible lending practices, which are provided in a safe and sound manner to address the credit needs of low-and moderate-income individuals.
- Fair lending policies and practices are considered reasonable.
- Community Development Services are considered adequate.

PERFORMANCE CONTEXT

Description of Mortgage Lender

Greenpark Mortgage Corporation, incorporated in the Commonwealth of Massachusetts on May 5, 2001, was granted a mortgage broker and lender license by the Division in August of 2001. Greenpark's main office is located at 140 Gould Street, Needham, Massachusetts. The lender has four additional branches located in Quincy, Westborough, Franklin and West Roxbury. The company is also licensed as a mortgage lender in New Hampshire, Connecticut, Rhode Island, Maine, Vermont, and Florida.

Greenpark offers a variety of mortgage loan products to meet the needs of the Commonwealth's borrowers. Greenpark is a direct endorsed lender for the Federal Housing Administration. The lender is an approved originator of the Veteran's Administration loan products, and is working towards full underwriting authority. As a broker, Greenpark offers numerous MassHousing products. Additionally, Greenpark is the endorsed lender for the Massachusetts Teachers Association ("MTA"), offering lower rates and closing costs to all members of the MTA.

All underwriting and major functions in the loan process are centralized at Greenpark's main office in Needham. Approved loans are funded through a warehouse line of credit with either Bank of America or Comerica. Greenpark's business development relies primarily on referrals, repeat customers, and home buying and educational seminars. Loans originated are closed in Greenpark's name and sold immediately to investors.

Demographic Information

The MLCI regulation requires mortgage lenders to be evaluated on their performance within the Commonwealth of Massachusetts. Demographic data is provided below to offer contextual overviews of economic climate along with housing and population characteristics for the Commonwealth of Massachusetts.

DEMOGRAPHIC INFORMATION*						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A
Geographies (Census Tracts)	1,361	8.4	21.7	46.1	23.4	0.4
Population by Geography	6,349,097	5.8	20.5	47.6	26.0	0.1
Owner-Occupied Housing by Geography	1,508,248	1.6	12.8	54.0	31.6	0.0
Family Distribution by Income Level	1,587,537	20.5	17.7	22.3	39.5	0.0
Distribution of Low and Moderate Income Families throughout AA Geographies	606,419	10.0	29.4	46.2	14.4	0.0
Median Family Income		\$65,318	Median Housing Value		\$209,519	
2009 HUD Adjusted Median Family Income		\$82,684	Unemployment Rate		9.3%**	
Households Below Poverty Level		9.8%				

*Source: PCI Corporation Inc., CRA Wiz, Data Source: 2000 US Census

**as of 2/10

Based on 2000 Census data, the Commonwealth of Massachusetts has a total population of just over 6.3 million people and a total of 2.6 million housing units. Of the total housing units, 1.5 million or 57.5 percent are owner-occupied, 935,332 or 35.7 percent are rental-occupied, and 6.8 percent are vacant units.

Low-income is defined as individual income that is less than 50 percent of the area median income. Moderate-income is defined as individual income that is at least 50 percent and less than 80 percent of the area median income. Middle-income is defined as individual income that is at least 80 percent and less than 120 percent of the area median income. Upper-income is defined as individual income that is more than 120 percent of the area median income.

There are 2.4 million households in the Commonwealth with a median household income of \$53,686 according to the 2000 Census. Over 40 percent of the households are classified as low- and moderate-income. In addition, 9.8 percent of the total number of households are living below the poverty level. Individuals in these categories may find it challenging to qualify for traditional mortgage loan products.

Households classified as “families” total slightly over 1.5 million. Of all family households, 20.5 percent are low income, 17.7 percent are moderate income, 22.3 percent are middle income, and 39.5 percent are upper income. The median family income according to the 2000 census was \$65,318. The Housing and Urban Development (“HUD”) adjusted median family income is \$82,684. The adjusted median family income is updated yearly and takes into account inflation and other economic factors.

The Commonwealth of Massachusetts contains 1,361 Census tracts. Of these, 114 or 8.4 percent are low-income; 295 or 21.7 percent are moderate-income; 628 or 46.1 percent are middle-income; 319 or 23.4 percent are upper-income; and 5 or 0.4 percent are NA or have no income designation. The five census tracts with no income designation are located in Bridgewater (a correctional facility), Boston (islands in Boston Harbor), Amherst (U MASS campus), Harvard (Fort Devens), and Grafton (Tufts Veterinary School). These Census tracts contain no housing units and will not be included in this evaluation since they provide no lending opportunities.

The median housing value for Massachusetts was \$209,519 according to the 2000 Census. However, recent figures from the Warren Group, publishers of the Banker’s and Tradesman, show the median price for a single-family increased to \$345,000 in 2007 and experienced a drop of 11.6 percent to \$305,000 in 2008. Fluctuating housing values have a direct effect in mortgage affordability and the types of financial products adequate for homeowners and property buyers.

The unemployment rate for Massachusetts as of March 2010 was 9.3 percent, up from 7.7 percent in March 2009. This represents a significant increase from 2007 when the unemployment rate stood at 6.7 percent. A consistent increase in job losses may impact borrowers’ ability to remain current on mortgage loan obligations and correlates with high delinquency and rising default rates.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Greenpark Mortgage Corporation's lending efforts are rated under the five performance criteria: Geographic Distribution, Borrower Characteristics, Innovative or Flexible Lending Practices, Fair Lending Policies and Procedures, and Loss of Affordable Housing. The following information details the data compiled and reviewed, as well as conclusions on the mortgage lending of Greenpark.

I. *Geographic Distribution*

The geographic distribution of loans was reviewed to assess how well Greenpark is addressing the credit needs throughout the Commonwealth of Massachusetts' low-, moderate-, middle-, and upper-income Census tracts.

The following table presents Greenpark's HMDA reportable loans as well as the 2008 and 2009 aggregate data (exclusive of Greenpark). In addition, the table also reflects the percentage of owner-occupied housing units in each of the Census tract income categories.

<i>Distribution of HMDA Loans by Income Category of the Census Tract</i>							
<i>Census Tract Income Level</i>	<i>% Total Owner-Occupied Housing Units</i>	<i>Greenpark 2008</i>		<i>Aggregate Lending Data (% of #) 2008</i>	<i>Greenpark 2009</i>		<i>Aggregate Lending Data (% of #) 2009</i>
		<i>#</i>	<i>%</i>		<i>#</i>	<i>%</i>	
<i>Low</i>	1.6	13	1.3	2.2	26	0.9	1.5
<i>Moderate</i>	12.8	103	10.5	14.2	220	7.3	10.7
<i>Middle</i>	54.0	459	46.7	51.8	1,358	45.0	50.8
<i>Upper</i>	31.6	408	41.5	31.7	1,410	46.8	37.0
<i>NA*</i>	0	0	0.0	0.1	0	0.0	.0
<i>Total</i>	100.0	983	100.0	100.0	3,014	100.0	100.0

Source: 2008 and 2009 HMDA Data and 2000 U.S. Census

The mortgage lender's geographic distribution of loans was consistent with the distribution of owner occupied housing units in the low-income census tracts for 2008 but was below the aggregate's lending in those tracts. However, the 2008 relative performance reflected an improvement over 2007 and continued to improve relative to achieving parity with the aggregate in 2009. Another mitigating factor affecting performance in the low-income Census tracts is that Greenpark doubled the number of loans originated in the low-income Census tracts. The improvement in performance year over year is also reflected in lending in moderate income Census tracts where Greenpark showed improvement in comparison to the aggregate each year while, in the most recent year, more than doubled the number of loans originated in moderate-income Census tracts. For 2009, Greenpark ranked 24th out of over 500 lenders for originations in low- and moderate-income Census tracts in Massachusetts.

Overall, given the relative ranking, the significant increase in volume and the positive trend in relation to the aggregate, Greenpark's distribution of loans reflects adequate performance in the Commonwealth.

II. Borrower Characteristics

The distribution of loans by borrower income levels was reviewed to determine the extent to which the lender is addressing the credit needs of the Commonwealth's residents.

The following table shows HMDA-reportable loans to low-, moderate-, middle- and upper-income borrowers in comparison to the aggregate and the percentage of total families within the Commonwealth in each respective income group.

Distribution of HMDA Loans by Borrower Income							
Median Family Income Level	% of Families	Greenpark Mortgage 2008		Aggregate Lending Data (% of #) 2008	Greenpark Mortgage 2009		Aggregate Lending Data (% of #) 2009
		#	%		#	%	
Low	20.5	31	3.2	5.0	88	2.9	5.1
Moderate	17.7	139	14.1	16.9	430	14.3	16.6
Middle	22.3	251	25.5	23.8	827	27.4	23.7
Upper	39.5	558	56.8	37.8	1,447	48.0	39.6
NA*	0	4	0.4	16.5	222	7.4	15.0
Total	100.0	983	100.0	100.0	3,014	100.0	100.0

Source: 2008 & 2009 HMDA Data and 2000 U.S. Census *Income Not Available

As with the analysis of geographic distribution, additional review and analysis was undertaken to ensure an accurate evaluation. Greenpark's performance in relation to the aggregate for low-income borrowers fell short. However, the 2008 performance reflected significant improvement in volume and relative comparison to the aggregate over 2007 where Greenpark originated 18 loans, or 1.7 percent of total lending, in this category when the aggregate stood at 4.1 percent. Greenpark's volume of lending to low-income borrowers increased by over 70 percent in 2008 while its percentage of lending in this category nearly doubled and the gap in comparison to the aggregate was reduced. The lending data for 2009 shows that Greenpark's lending to low- and moderate-income borrowers tripled in number of loans; however, the gap in performance in comparison to the aggregate widened in the category of low-income borrowers. A noted difference in the 2009 lending activity is the emergence of loans for which income was unavailable. Greenpark offered an FHA mortgage loan refinance product which required minimal documentation from existing mortgagors who were not required to disclose an income. It is conceivable that this flexible loan benefited each income category of borrowers proportionately and reflects Greenpark's willingness to lend to borrowers of all income categories which is evident in the company's ranking. For 2009, Greenpark ranked 28th out of over 500 lenders for originations to low- and moderate-income borrowers in Massachusetts.

Overall, given the relative ranking and the significant increase in volume, Greenpark's distribution of loans reflects adequate performance in the Commonwealth.

III. Innovative or Flexible Lending Practices

Greenpark offers a number of flexible lending products, which are provided in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Greenpark is the endorsed lender for the MTA. Through this program, Greenpark offers a variety of benefits to members of the MTA. These benefits include discounts on closing costs, low-interest-rate programs, free pre-approvals and qualifications, and a wide range of first time

homebuyer programs. In addition, Greenpark offers free home-buying seminars in local communities and on-line. In 2008, Greenpark funded 330 MTA loans with a total dollar volume of \$89,550,537. In 2009, the volume more than doubled to represent a total of 771 MTA loans with a dollar volume of \$203,393,589.

Greenpark is a Direct Endorsed Lender for the Federal Housing Administration (FHA). FHA products provide competitive interest rates, smaller down payments for low- and moderate-income first time homebuyers and existing homeowners. Greenpark also offers the FHA 203K loan program. The 203K loan is similar to a traditional mortgage with a construction loan added. The program gives homebuyers an opportunity to purchase their home and renovate it at the same time. In 2008, Greenpark's FHA loan production was 235 loans, which represented \$63,085,306 in dollar volume. In 2009, there was a significant increase in the origination of FHA loans. Greenpark funded a total 591 loans with a dollar volume of 168,390,931.

Greenpark has delegated underwriting authority to GMAC and Bank of America for My Community lending products. The product serves low- and moderate-income borrowers and communities with flexible terms and many options.

Greenpark offers the USDA Rural Housing Program which is an innovative loan program that provides 100% financing for eligible homebuyers in rural-designated areas. This program is for home purchase transactions offering fixed rates and does not require a downpayment. Income requirements do apply and borrowers can earn no more than 115% of the HUD median income for their area, adjusted by family size. The property must be located in a rural development designated area and meet additional requirements. In 2009, 1 loan was closed with a dollar volume of \$103,020.

IV. Fair Lending

The Division examines a mortgage lender's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-103 and Regulatory Bulletin 5.3-101. The mortgage lender's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. The review included, but was not limited to, review of written policies and procedures, interviews with mortgage lender personnel, and individual file review. No evidence of disparate treatment was identified.

Greenpark has established an adequate record relative to fair lending policies and practices.

Fair lending is incorporated into Greenpark's company-wide policy. The policy states that employees will not discriminate against loan applicants on the basis of race, sex, religion, color, national origin, age, marital status, familial status, disability, veteran status, sexual orientation, gender identity, or any basis prohibited by applicable law. Complying with this policy is the responsibility of every employee.

Greenpark ensures that fair lending is enacted within the company and customers are treated fairly by utilizing an outside vendor to conduct quarterly monitoring of the lending process. Areas that are analyzed for fair lending include: similarly situated borrowers by property and transaction characteristics, similarly situated borrowers by underwriting and credit score, compliance and service standards of the processor, compliance and service standards of the underwriter and pricing by race and ethnicity.

Greenpark participates in several trainings throughout the year which include Fair Lending Training and compliance with the Home Mortgage Disclosure Act, Real Estate Settlement Procedures Act, as well as other updates on laws and regulations. Trainings occur on-site at Greenpark and also online hosted by an outside vendor. All updates to policies and procedures are made available to employees through company meetings, trainings, and communication via email.

MINORITY APPLICATION FLOW

Demographic information for Massachusetts reveals that the total ethnic and racial minority population stood at 18.12 percent of the total population in 2008. This segment of the population is comprised of 6.75 percent Hispanic or Latino and 11.38 racial minority: 5.01 percent Black; 3.73 percent Asian; .18 percent American Indian; .03 percent Native Hawaiian/Other Pacific Islander; and 2.42 percent identified as Other Race.

For 2008 and 2009, Greenpark received 4,742 HMDA-reportable loan applications from within the Commonwealth of Massachusetts. Of these applications, 391 or 8.2 percent were received from minority applicants, of which 329 or 84.1 percent resulted in originations. Greenpark received 106 or 2.2 percent of HMDA reportable applications from ethnic groups of Hispanic origin within its assessment area of which 72 or 67.9 percent were originated.

Refer to the following table for information on the mortgage lender's minority application flow as well as a comparison to aggregate lenders throughout the Commonwealth of Massachusetts. The comparison of this data assists in deriving reasonable expectations for the rate of applications the mortgage lender received from minority applicants.

MINORITY APPLICATION FLOW								
RACE	Greenpark 2008		2008 Aggregate Data		Greenpark 2009		2009 Aggregate Data	
	#	%	#	%	#	%	#	%
<i>American Indian/ Alaska Native</i>	0	0.0	687	0.2	3	0.1	730	0.2
<i>Asian</i>	51	4.4	11,734	3.5	158	4.4	19,944	4.1
<i>Black/ African American</i>	19	1.7	11,683	3.5	47	1.3	10,024	2.0
<i>Hawaiian/Pac Isl.</i>	0	0.0	639	0.2	2	0.1	554	.1
<i>2 or more Minority</i>	0	0.0	280	0.1	0	0.0	230	.1
<i>Joint Race (White/Minority)</i>	26	2.2	3,174	1.0	85	2.3	4,939	1.0
Total Minority	96	8.3	28,197	8.5	295	8.2	36,421	7.5
<i>White</i>	1,043	90.5	232,490	69.7	3,273	91.2	340,923	69.5
<i>Race Not Available</i>	14	1.2	72,886	21.8	21	0.6	112,611	23.0
Total	1,153	100.0	333,573	100.0	3,589	100.0	489,955	100.0
ETHNICITY								
<i>Hispanic or Latino</i>	16	1.4	13,185	3.9	38	1.1	11,445	2.3
<i>Not Hispanic or Latino</i>	1,110	96.3	244,554	73.3	3,471	96.7	361,096	73.7
<i>Joint (Hisp/Lat /Not Hisp/Lat)</i>	13	1.1	2,634	0.8	39	1.1	3,653	.8
<i>Ethnicity Not Available</i>	14	1.2	73,200	22.0	41	1.1	113,761	23.2
Total	1,153	100.0	333,573	100.0	3,589	100.0	489,955	100.0

Source: PCI Corporation CRA Wiz, Data Source: 2000 U.S. Census Data

As shown in the chart above, Greenpark's performance was comparable with the 2008 aggregate's performance for racial minority applicants and outpaced the performance of the aggregate for 2009. The mortgage lender's performance was below the aggregate for applications from ethnic minorities in 2008 but narrowed the gap in 2009 through an increase in applications. Greenpark received 2.5 percent of its applications from ethnic minorities while the aggregate received 4.7 percent in 2008; in 2009, Greenpark received 2.2 of its applications for ethnic minorities while the aggregate decreased to 3.1.

Overall, the mortgage lender's performance in this area is considered reasonable.

V. Loss of Affordable Housing

This review concentrated on the suitability and sustainability of mortgage loans originated by Greenpark by taking into account delinquency and default rates of the mortgage lender and those of the overall marketplace. Information provided by the lender was reviewed as were statistics available on delinquency and default rates for mortgage loans. Additionally, individual mortgage loans were tracked for their status through local Registries of Deeds and other available sources including public records of foreclosure filings.

An extensive review of information and documentation, from both internal and external sources as partially described above, did not reveal lending practices or products that showed an undue concentration or a systematic pattern of lending, including a pattern of early payment defaults, resulting in the loss of affordable housing units. Further, delinquency rates were found to be consistent with industry averages.

SERVICE TEST

The service test evaluates a mortgage lender's record of helping to meet the mortgage credit needs in the Commonwealth by analyzing both the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products; the extent and innovativeness of its community development services; and loss mitigation services to modify loans or otherwise keep delinquent home loan borrowers in their homes. Community development services must benefit the Commonwealth or a broader regional area that includes the Commonwealth.

Greenpark Mortgage Corporation's Service Test performance was determined to be "Satisfactory" at this time.

Mortgage Lending Services

Greenpark provides effective delivery of mortgage lender services that are accessible to geographies and individuals of different income levels in the Commonwealth. Customers can apply to Greenpark for a mortgage over the telephone and via the company's website and at any of the five sales office locations. Greenpark's main office is located at 140 Gould Street in Needham, situated in an upper-income geography. The other offices are located in Franklin and Quincy, which are in middle income geographies, and Westboro and West Roxbury, which are upper income geographies. In 2008 and 2009, Greenpark closed five of its sales offices located in Acton, Boston, Leominster, and Lawrence, Massachusetts and Warwick, Rhode Island. All of the Massachusetts offices were in either middle- or upper-income Census tracts, with the exception of Lawrence which was in a low-income Census tract.

Business development relies primarily on referrals, repeat customers, and homebuying and educational seminars. Greenpark's major source of business comes from being the endorsed lender for the MTA.

As Greenpark does not routinely service mortgage loans, it would not work directly with delinquent borrowers. Therefore, this review would not include an evaluation of loan mitigation and modification efforts as the mortgage lender would not be accountable for such action. However, as described above, lending practices and products did not show an undue concentration or a systematic pattern of lending resulting in mortgage loans that were not sustainable.

Community Development Services

A community development service is a service that:

- (a) has as its primary purpose community development; and
- (b) is related to the provision of financial services, including technical services

The Commissioner evaluates community development services pursuant to the following criteria:

- (a) the extent to which the mortgage lender provides community development services; and
- (b) the innovativeness and responsiveness of community development services.

Greenpark provides an adequate level of Community Development Services.

Greenpark participates in a variety of community developments services, many of which are educational seminars taught by individual loan officers or a group of staff from Greenpark. Seminar topics include an overview on the basics of FHA products and VA products, financial literacy seminars, and first time home buyer seminars. In 2008 and 2009, Greenpark hosted 19 seminars at several of its office locations, at realtor office locations, and at local colleges.

Qualified Investments

A qualified investment is a lawful investment, deposit, membership share, or grant having as its primary purpose community development.

Greenpark Mortgage made qualified contributions totaling \$12,500 to benefit organizations located in the Commonwealth of Massachusetts.

In 2010, Greenpark donated to CAN-DO, (Citizens for Affordable Housing in Newton Development Organization, Inc.), which is a community-based non-profit developer of affordable housing for individuals and families with low and moderate incomes. Founded in 1994, CAN-DO has developed and currently manages a number of affordable housing units, which serve a diverse population.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 255E, Section 8, and 209 CMR 54.00, the Mortgage Lender Community Investment (MLCI) regulation, requires all mortgage lenders to take the following actions within 30 business days of receipt of the MLCI evaluation of their mortgage lender:

- 1) Make its most current MLCI performance evaluation available to the public.
- 2) Provide a copy of its current evaluation to the public, upon request. In connection with this, the mortgage lender is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the mortgage lender's evaluation, as prepared by the Division of Banks, may not be altered or abridged in any manner. The mortgage lender is encouraged to include its response to the evaluation in its MLCI public file.

The Division of Banks will publish the mortgage lender's Public Disclosure on its website no sooner than 30 days after the issuance of the Public Disclosure.